

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

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) Civil Action No. 03 MDL 1570 (GBD) (SN)  
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This document relates to:

Ashton, et al. v. al Qaeda, et al., No. 02-cv-6977  
Federal Insurance Co., et al. v. al Qaida, et al., No. 03-cv-6978  
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03-cv-9849  
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04-cv-5970  
Cantor Fitzgerald Assocs., et al. v. Akida Inv. Co., et al. No. 04-cv-7065  
Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 04-cv-7279  
McCarthy, et al. v. Kingdom of Saudi Arabia, No. 16-cv-8884  
Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-9663  
Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-9937  
Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-117  
DeSimone v. Kingdom of Saudi Arabia, No. 17-cv-348  
Aiken, et al v. Kingdom of Saudi Arabia, et al., No. 17-cv-450  
The Underwriting Members of Lloyd's Syndicate 53, et al. v. Kingdom of Saudi Arabia, et al.,  
No. 17-cv-2129  
The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-2651  
Abarca, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-3887  
Arrowood Indemnity Co. v. Kingdom of Saudi Arabia, et al., No. 17-cv-3908  
Abrams, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-4201  
Abtello, et al. v. Kingdom of Saudi Arabia et al., No. 17-cv-5174  
Aasheim, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-5471

**MOTION TO EXTEND PRO HAC VICE ADMISSION TO ALL CONSOLIDATED MDL  
CASES, AND NOTICES OF APPEARANCE**

I. Motion To Extend Pro Hac Vice Admission of Roy T. Englert, Jr.

PLEASE TAKE NOTICE that the Saudi High Commission for Relief of Bosnia & Herzegovina ("Saudi High Commission") hereby moves this Court for an Order extending the pro hac vice admission of Roy T. Englert, Jr., to all cases consolidated into 03 MDL 1570 (GBD) (SN), a multi-district litigation ("MDL") before this Court.

Roy T. Englert, Jr. was admitted as counsel pro hac vice on June 28, 2004, for purposes of this MDL. See Dkt. 270.

As this Court is aware, numerous additional cases have been consolidated into this MDL in recent months. Moving for pro hac vice admission in each related case would be cumbersome and would require repeated applications to the Court. Saudi High Commission moves the Court to extend counsel's pro hac vice admission to all cases consolidated into 03 MDL 1570, now or in the future, and to permit counsel to appear in the above-captioned cases by filing notices of appearance, and to do the same in other consolidated MDL cases as appropriate.

II. Notices of Appearance by Roy T. Englert, Jr., and Lawrence S. Robbins

To the Clerk of this Court and all parties of record:

PLEASE TAKE NOTICE that Saudi High Commission has applied to extend the pro hac vice admission of Roy T. Englert, Jr. to all cases consolidated into this MDL. If that request is granted, Saudi High Commission respectfully requests that the Court enter Mr. Englert's appearance as its counsel in all of the above-captioned MDL cases, which Saudi High Commission understands includes every case in which Saudi High Commission has been named as a defendant and in which plaintiffs have adopted the Consolidated Amended Complaint. See Dkt. 3463.

Lawrence S. Robbins was admitted to the United States District Court for the Southern District of New York on December 9, 1980, and is currently a member in good standing of the bar of the United States District Court for the Southern District of New York. Saudi High Commission respectfully requests that the Court enter his appearance as its counsel in the above-captioned cases.

The caption above lists two recently filed cases –Aasheim and Abtello – in which plaintiffs have filed a Short Form Complaint but have not yet requested a waiver of service from

Saudi High Commission or made any filing on the consolidated MDL docket. As of this filing, it appears that Aasheim has been formally incorporated into the consolidated MDL, but Abtello has not. Saudi High Commission wishes to file appearances in these cases to ensure that it may file copies of its forthcoming motion to dismiss on their individual dockets on August 1.

In filing these appearances, Saudi High Commission respectfully reserves all defenses and objections to these lawsuits, including without limitation objections to this Court's subject matter or personal jurisdiction.

Respectfully submitted,

/s/ Lawrence S. Robbins

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Lawrence S. Robbins (LR8917)

Roy T. Englert, Jr.

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July 28, 2017

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Respectfully submitted,

/s/ Roy T. Englert, Jr.

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Roy T. Englert, Jr.

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July 28, 2017

*Attorneys for the Saudi High Commission for Relief  
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### **CERTIFICATE OF SERVICE**

I hereby certify that, on July 28, 2017, I caused an electronic copy of the foregoing Notices of Appearance to be served electronically pursuant to the Court's Electronic Case Filing (ECF) system. I caused the foregoing to be filed on the MDL docket and the dockets for the following consolidated cases:

Ashton, et al. v. al Qaeda, et al., No. 02-cv-6977  
Federal Insurance Co., et al. v. al Qaida, et al., No. 03-cv-6978  
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03-cv-9849  
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The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-2651  
Abarca, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-3887  
Arrowood Indemnity Co. v. Kingdom of Saudi Arabia, et al., No. 17-cv-3908  
Abrams, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-4201  
Abtello, et al. v. Kingdom of Saudi Arabia et al., No. 17-cv-5174  
Aasheim, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-5471

/s/ Lawrence S. Robbins

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Lawrence S. Robbins

July 28, 2017